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8 IN THE UNITED STATES DISTRICT COURT  
9 EASTERN DISTRICT OF CALIFORNIA  
10

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$24,900.00  
IN U.S. CURRENCY,

15  
16 Defendant.

2:21-MC-00264-MCE-AC

STIPULATION AND ORDER EXTENDING TIME  
FOR FILING A COMPLAINT FOR FORFEITURE  
AND/OR TO OBTAIN AN INDICTMENT  
ALLEGING FORFEITURE

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18 It is hereby stipulated by and between the United States of America and potential claimant  
19 Christopher Fluke (“claimant”), by and through their respective counsel, as follows:

20 1. On or about August 4, 2021, claimant filed a claim in the administrative forfeiture  
21 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
22 \$24,900.00 in U.S. Currency (hereafter “defendant currency”), which were seized on May 25, 2021.

23 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
24 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
25 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim  
26 to the defendant currency as required by law in the administrative forfeiture proceeding.

27 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
28 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency

1 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture  
2 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
3 That deadline was November 2, 2021.

4 4. By Stipulation and Order filed November 8, 2021, the parties stipulated to extend to  
5 December 30, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
6 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
7 to forfeiture.

8 5. By Stipulation and Order filed January 5, 2022, the parties stipulated to extend to February  
9 28, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
10 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
11 forfeiture.

12 6. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to March  
13 30, 2022, the time in which the United States is required to file a civil complaint for forfeiture against the  
14 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
15 forfeiture.

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7. Accordingly, the parties agree that the deadline by which the United States shall be required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to forfeiture shall be extended to March 30, 2022.

Dated: 2/23/2022

PHILLIP A. TALBERT  
United States Attorney


By: /s/ Kevin C. Khasigian  
KEVIN C. KHASIGIAN  
Assistant United States Attorney

Dated: 2/18/2022

/s/ Carolyn Hagin Emison  
CAROLYN HAGIN EMISON  
Attorney for potential claimant  
Christopher Fluke  
(Signature authorized by email)

IT IS SO ORDERED.

Dated: February 28, 2022

  
MORRISON C. ENGLAND, JR.  
SENIOR UNITED STATES DISTRICT JUDGE